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August 21, 2009

Judge Roslyn O. Silver
United States District Court
Sandra Day O'Connor U.S. Courthouse, Suite 624
401 W. Washington Street, SPC 59
Phoenix, AZ 85003-2158

Re: *Watson v. City of Phoenix, et al.*, CV-08-1129-PHX-ROS
First Notice of Discovery and Settlement

Dear Judge Silver:

The parties unsuccessfully mediated this matter in June, 2008, soon after the Complaint was filed. Since then and before any depositions were taken, the Plaintiffs offered to settle this matter for an amount previously discussed at the mediation. Counsel for Defendants must obtain approval for any settlement from the City of Phoenix through its claims committee process. The presentation to the claims committee will be made after the Plaintiffs' depositions.

Plaintiffs will be deposed on September 21 and 24. Plaintiffs just completed the depositions of the three police officers involved in Doris Watson's incident as well as one of the paramedics that responded to the scene. Defendants have served written discovery requests, the responses to which are due September 11, 2009. Plaintiffs are in the process of promulgating their written discovery requests. No discovery disputes have arisen thus far.

Yours very truly,

STINSON MORRISON HECKER LLP

Leslie E. O'Hara
Attorney for Plaintiffs

KANSAS CITY
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JONES, SKELTON & HOCHULI PLC

Kathleen L. Wienke
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Attorney for Defendants
*for and with
the consent of*

LEO:rvs